

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

1:11CR116

FILED
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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION
CINCINNATI

UNITED STATES OF AMERICA : CRIMINAL NO.
: :
vs. : INDICTMENT
: 18 U.S.C. § 2
MARQUEETA TIBBS, and : 18 U.S.C. § 371
ZEFFREY TIBBS : 18 U.S.C. § 1519
: 29 U.S.C. § 501(c)
:

J. BARRETT

THE GRAND JURY CHARGES THAT:

COUNT 1
(18 U.S.C. § 371)

1. Beginning in March 2010, and continuing until November, 2010, defendants
MARQUEETA TIBBS and **ZEFFREY TIBBS**, in the Southern District of Ohio and
elsewhere, did knowingly and willfully conspire and agree among themselves to commit
the following offenses, and attempted to do so:
 - a. While employed directly or indirectly by a labor organization engaged in an
industry affecting commerce, did embezzle, steal, and unlawfully and willfully
abstract and convert to their own use (and the use of another) the moneys, funds,
securities, property, and other assets of said labor organization, and attempt to do
so, in violation of Title 29, United States Code, Section 501(c), and Title 18,
United States Code, Section 2.
2. At all times relevant to this Indictment, defendant **MARQUEETA TIBBS** was employed
as an office secretary for a labor organization in Portsmouth, Ohio called the Carpenters

Local 437, which is engaged in an industry affecting interstate commerce.

3. The object of the conspiracy was to embezzle funds from the Carpenters Local 437.
4. In order to further the object of the conspiracy and in an effort to attain its objectives, Defendants **MARQUEETA TIBBS and ZEFFREY TIBBS** committed the following overt acts, among others, in the Southern District of Ohio:
 - a. On May 21, 2010, **MARQUEETA TIBBS** issued an unauthorized check from the union's account made payable to **ZEFFREY TIBBS** in the amount of \$5000;
 - b. On July 26, 2010, **MARQUEETA TIBBS** issued an unauthorized check from the union's account made payable to **ZEFFREY TIBBS** in the amount of \$5000; and
 - c. On October 29, 2010, **MARQUEETA TIBBS** issued an unauthorized check from the union's account made payable to **ZEFFREY TIBBS** in the amount of \$3500.01.

All in violation of Title 18, United States Code, Sections 371 and 2.

COUNT 2
(29 U.S.C. § 501(c))

5. At all times relevant to this Indictment, defendant **MARQUEETA TIBBS** was the Office Secretary for a labor organization in the Southern District of Ohio, namely Carpenters Local 437 in Portsmouth, Ohio, which is engaged in an industry affecting interstate or foreign commerce and is subject to 29 U.S.C. § 401, et seq.
6. On or about March 2010 through November 2010, in the Southern District of Ohio, the defendant **MARQUEETA TIBBS**, while employed directly or indirectly by the Carpenters Local 437, a labor organization engaged in an industry affecting commerce, did embezzle, steal, and unlawfully and willfully abstract and convert to her own use (and the use of

another) the moneys, funds, securities, property, and other assets of said labor organization in the approximate amount of \$84,903.53, and attempted to do so;

In violation of Title 29, United States Code, Section 501(c), and Title 18, United States Code, Section 2.

COUNT 3
(18 U.S.C. § 1519)

7. On or about November 10, 2010, in the Southern District of Ohio, the defendant, **MARQUEETA TIBBS**, did knowingly falsify records and documents (namely the creation and presentment of false emails designed to frame a coworker), with the intent to impede, obstruct, and influence the investigation and proper administration of this embezzlement investigation, which is a matter within the jurisdiction of the Department of Labor, a department of the United States;

In violation of Title 18, United States Code, Section 1519.

A TRUE BILL.



GRAND JURY FOREPERSON

CATER M. STEWART
UNITED STATES ATTORNEY



ANTHONY SPRINGER
CINCINNATI BRANCH CHIEF